

Exhibit F

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No.
07-5944 SC

THIS DOCUMENT RELATES TO:
INDIRECT PURCHASER ACTIONS

MDL No. 1917

SUPERIOR COURT OF THE STATE OF CALIFORNIA
CITY AND COUNTY OF SAN FRANCISCO

STATE OF CALIFORNIA, et al.,
Plaintiffs,

vs.

Case No.
CGC-11-51584

SAMSUNG SDI, INC., CO., LTD.,
et al.,
Defendants.

VIDEOTAPED

DEPOSITION OF:

DAVID RANDALL ROOKS

TAKEN ON BEHALF OF:

TOSHIBA DEFENDANTS

DATE TAKEN:

FRIDAY, NOVEMBER 30, 2012

TIME:

9:10 A.M. - 2:57 P.M.

PLACE:

20 NORTH ORANGE AVENUE
SUITE 1600
ORLANDO, FLORIDA 32801

TAKEN BEFORE:

NINETTE LONG, RPR, FPR, CLR
AND NOTARY PUBLIC

1 perhaps the most expensive television you looked at?

2 A. For a 31-inch CRT television, it would be my
3 guess that, yes, it probably was. And that's why I
4 struggled with it.

5 Q. Do you remember how much more your television
6 was than the other brands?

7 A. No, I don't.

8 Q. Did a user guide or manual come with your
9 product?

10 A. Yes, it did.

11 Q. Do you still have that?

12 A. No, I don't.

13 (CRT [Exhibit 593](#) was marked for
14 Identification.)

15 BY MS. NAIFEH:

16 Q. I'd like to mark this as 593. I represent
17 that I obtained this document from Panasonic's website.
18 Can you please tell me what this document is?

19 A. Yeah. It looks like -- it appears to be the
20 Panasonic color television operating instructions.

21 Q. Okay. Does it look familiar to you?

22 A. It looks -- it looks familiar.

23 Q. Does it look like the owner's manual that came
24 with your television?

25 A. I don't know.

1 Q. You don't know.

2 A. Yeah. I don't know.

3 Q. Okay. Can you identify the model number of
4 the television you purchased?

5 A. If it's on the invoice. That's the only way
6 I'd be able to identify it, the model number.

7 Q. Okay. So is that the only document you have
8 that would refresh your recollection?

9 A. Yes.

10 Q. Do you still have the Panasonic television?

11 A. No.

12 Q. Mr. Rooks, I'm going to hand you a document
13 that has been already marked as Exhibit 373. So if you
14 could turn to the second page of this document where it
15 says Samsung Exhibit B34 at the top.

16 A. Uh-huh.

17 Q. Does this document look familiar to you?

18 A. Yes.

19 Q. Under No. 1, where it says CRT Product,
20 Panasonic Television Model CT36HX41, is that the model
21 number of your Panasonic television?

22 A. If that's what it says on the invoice.

23 Q. Okay. Let's take a look at the invoice.

24 MS. NAIFEH: So we don't have the copies yet,
25 do we, from --

1 foundation.

2 Can I have a standing objection, lacks
3 foundation, to any questions based on 596?

4 BY MS. NAIFEH:

5 Q. Does this document refresh your recollection
6 that your television was a 36-inch television?

7 MR. GRALEWSKI: Object to the form. Lacks
8 foundation.

9 Counsel, can I have a standing objection to
10 any questions based on 596 as lack of foundation?

11 MS. NAIFEH: Okay.

12 MR. GRALEWSKI: Thank you.

13 You can answer the question.

14 THE WITNESS: Okay. That's a possibility.

15 BY MS. NAIFEH:

16 Q. It's possible that it was a 36-inch
17 television.

18 A. It's possible. I don't recall.

19 Q. Okay.

20 A. I just know it was heavy.

21 Q. But you stated that you -- you no longer own
22 the television?

23 A. No, I don't.

24 Q. And you never measured it, so it's possible
25 that it could be a 36-inch television.

1 Q. Okay. Were you concerned about -- what would
2 happen after the extended warranty expired?

3 A. No.

4 Q. Okay. Why not?

5 A. At that point in time, if we're talking about
6 four years, you're talking about an average of \$500 a
7 year for a television set. I was comfortable at that
8 point in time with that. And then if after four or five
9 years I needed to get a new television set, then that
10 was fine.

11 Q. Was the size of the television important?

12 A. Yes.

13 Q. Why?

14 A. Bigger picture.

15 Q. Were there other larger TVs you could have
16 bought?

17 A. Yes.

18 Q. And why didn't you buy those?

19 A. Price.

20 Q. Was the manufacturer of the cathode ray tube
21 important?

22 A. No.

23 Q. Do you know who manufactured the cathode ray
24 tube inside your television?

25 A. No.